

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 21-CR-20050

v.

Honorable Linda V. Parker

Viktor Gjonaj,

Defendant.

Stipulated Preliminary Order of Forfeiture

Plaintiff, by and through its undersigned attorneys, and Defendant Viktor Gjonaj (Defendant), by and through his attorney, Steven Fishman, Esq., hereby submit this Stipulated Preliminary Order of Forfeiture for immediate entry by the Court.

Pursuant to Fed. R. Crim. P. 32.2, 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c), based upon Defendant's conviction for violating 18 U.S.C. § 1343 and the record in this case:

IT IS HEREBY ORDERED AND ADJUDGED that

1. Defendant shall forfeit all proceeds that he obtained as a result of his wire fraud scheme (Count One). A forfeiture money

judgment in the amount of Nineteen Million Twenty Five Thousand Dollars (\$19,025,000), representing the amount that Defendant personally obtained as a result of the wire fraud scheme charged in Count 1 of the Information, is GRANTED and ENTERED against Defendant in favor of the United States of America.

2. To satisfy the money judgment, any assets that Defendant has now, or may later acquire, may be forfeited as substitute assets under 21 U.S.C. § 853(p)(2).

3. The United States may, at any time, move, pursuant to Federal Rule of Criminal Procedure 32.2(e), to amend this Order to substitute property having a value not to exceed Nineteen Million Twenty Five Thousand Dollars (\$19,025,000) to satisfy the money judgment in whole or in part.

4. Federal Rule of Criminal Procedure 32.2(c)(1) provides that “no ancillary proceeding is required to the extent that the forfeiture consists of a money judgment.”

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5. The Court shall retain jurisdiction to enforce this Preliminary Order of Forfeiture and to amend it as necessary, pursuant to Fed. R. Crim. P. 32.2(e).

IT IS SO ORDERED.

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: March 18, 2021

Agreed as to form and substance:

Saima S. Mohsin
Acting United States Attorney

s/ Cassandra M. Resposo
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Dated: 3/17/2021

Dated: 3/18/2021

5. The Court shall retain jurisdiction to enforce this Preliminary Order of Forfeiture and to amend it as necessary, pursuant to Fed. R. Crim. P. 32.2(e).

Agreed as to form and substance:

Saima S. Mohsin
Acting United States Attorney

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